

DEFENDANT'S MOTION IN LIMINE NUMBER 16

EXHIBIT 3: Deposition of George Jones

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF ALABAMA
3 NORTHERN DIVISION

5 HAZEL M. ROBY, as Administratrix
6 of the Estate of RONALD TYRONE ROBY,
7 deceased,

8 Plaintiff,

9 CIVIL ACTION FILE

10 vs.

11 NO. 2:05CV194-T

12 BENTON EXPRESS, INC., et al.

13 Defendants.

14

15 VIDEOTAPED DEPOSITION OF

16 GEORGE WILLIAM JONES

17

18 September 26, 2005

19 2:22 p.m.

20

21 1180 West Peachtree Street

22 Suite 900

23 Atlanta, Georgia

24

25 Lisa Fischer, CCR-B-1277, RPR, CRR

A Legalink Company * 1933 Richard Arrington Jr. Blvd. S. * Birmingham, AL 35209 * www.legalink.com
1-800-888-DEPO

Page 16

1 A. No, sir.

2 Q. Arrested for what?

3 A. DUI.

4 Q. And have you been arrested on any
5 other occasion other than DUI?

6 A. No, sir.

7 Q. And when did the DUI occur?

8 A. When I was 18 years old, which was
9 nineteen -- 18.

10 Q. Any other incidents where you may have
11 been arrested or convicted of a crime by --

12 A. No, sir.

13 Q. In your time as an operations manager,
14 have you ever had a driver that was delayed?

15 A. Yes.

16 Q. Do you have any written rules or
17 policies that apply to your drivers in telling
18 them how much of a delay before they should
19 communicate with you or somebody at the
20 terminal?

21 A. Concerning line haul or city?

22 Q. Yeah, line haul.

23 A. Just if something out of the ordinary
24 occurs.

25 Q. What's considered "out of the